

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

LUX GLOBAL LABEL COMPANY,
LLC

Plaintiff,

vs.

JAMES H. SHACKLETT, IV, et al.,

Defendants.

)
)
)
) JUDGE CHRISTOPHER A. BOYKO
)
)
) **PLAINTIFF’S MOTION FOR LEAVE**
) **TO FILE FORENSIC INVENTORY**
) **UNDER SEAL PURSUANT TO THE**
) **STIPULATED PROTECTIVE ORDER**
) **[DOC.23].**
)
)
)

Now comes Plaintiff, Lux Global Label Company, LLC (“Plaintiff” or “Lux”), by and through counsel and pursuant to Local Rule 5.2 and the Court’s February 22, 2018 Stipulated Protective Order, asks the Court for leave to file the forensic inventory of the external storage device under seal. Specifically, the parties agreed to an electronically stored information (“ESI”) protocol under which the parties agreed to a third party forensic expert who imaged and provided an inventory of a external storage device that was in the possession of Defendant James H. Shacklett at the time of the filing of this lawsuit. Under the ESI Protocol, the parties agreed that the inventory generated by this third party forensic expert would be confidential and subject to the Court’s protective order.

Plaintiff requests that the Court, under Section 7 of the Stipulated Protective Order [Doc. 23], permit Plaintiff to file this inventory under seal as the information contained within the inventory is necessary to fully evaluate Plaintiff's claims and pending motion for injunctive relief.

Respectfully submitted by:

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s/ Ami J. Patel

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CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2018, a true and correct copy of the foregoing *Plaintiff's Motion for Leave to File Forensic Inventory Under Seal Pursuant to the Stipulated Protective Order [Doc.23]* was filed and served upon all counsel of record via the Court's electronic filing system.

s/ Ami J. Patel

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